

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

OTA FRANCHISE CORPORATION,
NEWPORT EXCHANGE HOLDINGS,
INC., NEH SERVICES, INC., EYAL
SHACHAR, SAMUEL R. SEIDEN, AND
DARREN KIMOTO,

Plaintiffs,

v.

FEDERAL TRADE COMMISSION,

Defendant.

No. 1:20-cv-000802

Judge Charles R. Norgle, Sr.

MOTION TO WITHDRAW AS COUNSEL OF RECORD

Pursuant to Local Rule 83.17, J. Douglas Baldridge, Leonard L. Gordon, Eric S. Berman, and Katherine Wright Morrone (collectively “Venable counsel”), all of the law firm Venable LLP, hereby move to withdraw their appearances as counsel of record for Plaintiffs OTA Franchise Corporation, Newport Exchange Holdings, Inc., NEH Services, Inc., Eyal Shachar, Samuel R. Seiden, and Darren Kimoto (collectively “Plaintiffs”). In support of this motion, Venable counsel state as follows:

1. On February 4, 2020, Plaintiffs filed this action against the Federal Trade Commission. (Dkt. 1). That same day, Mr. Baldridge entered his appearance on behalf of all Plaintiffs. (Dkt. 3). On February 5, 2020, Mr. Gordon, Mr. Berman, and Ms. Wright Morrone all filed motions to appear *pro hac vice* on behalf of all Plaintiffs in this matter. (Dkts. 8-10).

2. On February 21, 2020, Mark L. Eisenhut, of the firm Call and Jensen, APC moved to appear *pro hac vice* on behalf of all Plaintiffs in this matter. (Dkt. 12).

3. The law firm of Venable LLP is no longer engaged to represent Plaintiffs in this case. Venable counsel move to withdraw their appearances that were filed on behalf of Plaintiffs.

4. Plaintiffs have no objection to Venable counsel's request to withdraw and will continue to be represented by Mr. Eisenhut. Furthermore, Falkenberg Ives, LLP will continue to represent Plaintiffs as local counsel in this matter until Mr. Eisenhut is able to retain separate local counsel.

5. On March 6, 2020, counsel for the Federal Trade Commission, Mariel Goetz, entered her appearance for Defendant.

WHEREFORE, based on the foregoing, Venable counsel request the Court grant them leave to withdraw their appearances of record in this matter.

Dated: March 18, 2020.

Respectfully submitted,

/s/ J. Douglas Baldridge
J. Douglas Baldridge
Eric S. Berman (*admitted pro hac vice*)
Katherine Wright Morrone (*admitted pro hac vice*)
Venable LLP
600 Massachusetts Ave. NW
Washington, DC 20001
(202) 344-4000
jbaldridge@venable.com
esberman@venable.com
kwmorrone@venable.com

Leonard L. Gordon (*admitted pro hac vice*)
Venable LLP
Rockefeller Center

1270 Avenue of the Americas
24th Floor
New York, New York 10020
(212) 307-5500
llgordon@venable.com

Kirstin B. Ives
Falkenberg Ives LLP
230 W. Monroe, Suite 2220
Chicago, Illinois 60606
(312) 566-4803
kbi@falkenbergives.com

CERTIFICATE OF SERVICE

I hereby certify that on March 18, 2020, I caused the foregoing to be served upon all counsel of record by operation of the electronic filing system of the United States District Court for the Northern District of Illinois.

/s/ J. Douglas Baldrige
J. Douglas Baldrige